

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

LEOCADIO HERNANDEZ AND LETICIA  
DARIELA GARCIA, INDIVIDUALLY, AND  
AS NEXT FRIENDS FOR L.S.H., A MINOR

vs.

UNITED STATES OF AMERICA AND  
FORT DUNCAN MEDICAL CENTER, L.P.  
D/B/A FORT DUNCAN REGIONAL  
MEDICAL CENTER

[illegible]

CIVIL ACTION NO. 2:16-CV-00066

DEFENDANT FORT DUNCAN MEDICAL CENTER, L.P. D/B/A  
FORT DUNCAN REGIONAL MEDICAL CENTER'S RULE 26(a)(2)  
FIRST SUPPLEMENTAL DISCLOSURE OF EXPERT TESTIMONY

COMES NOW, FORT DUNCAN MEDICAL CENTER, L.P. d/b/a FORT DUNCAN REGIONAL MEDICAL CENTER, Defendant and makes and files their First Supplemental Disclosure of Expert Testimony pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and agreement of the parties.

Respectfully submitted,

GONZALEZ CASTILLO, LLP

By:

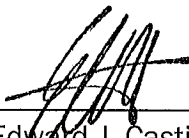
Steven Gonzalez  
SBN: 08131900  
FED. ID NO: 3321  
Edward J. Castillo  
SBN: 240406580  
FED. ID NO: 38007

1317 E. Quebec Avenue  
McAllen, Texas 78503  
(956) 618-0115  
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ATTORNEYS FOR DEFENDANT,  
FORT DUNCAN MEDICAL CENTER, L.P. D/B/A FORT  
DUNCAN REGIONAL MEDICAL CENTERS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been forwarded to attorney for all counsel of record via certified mail, return receipt requested, on this 27<sup>th</sup> day of March, 2017.

  
\_\_\_\_\_  
Edward J. Castillo

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DEFENDANT FORT DUNCAN MEDICAL CENTER, L.P. D/B/A  
FORT DUNCAN REGIONAL MEDICAL CENTER'S RULE 26(a)(2)  
FIRST SUPPLEMENTAL DISCLOSURE OF EXPERT TESTIMONY

- (a) In addition to the disclosures required by paragraph (1) a party shall disclose to other parties the identity of any person who may be used at trial to present evidence under Rules 702, 703, and 705 of the Federal Rules of Evidence.
- (b) Except as otherwise stipulated or directed by the Court, this disclosure shall, with respect to a witness who was retained or specifically employed to provide expert testimony in a case or whose duty as an employee of the party regularly involve giving expert testimony be accompanied by written report and signed by the witness. The report shall contain a complete statement of all opinions to be expressed and the basis and reasons they are for: the data or the information considered by the witness informing the opinions; any exhibits to be used as a summary of or support for the opinions; the qualifications of the witness, including a list of all publications authored by the witness within the proceeding ten (10) years; the compensation to be paid for the study and testimony; and a listing of any other cases in which the witness has testified as an expert at trial or by his deposition within the proceeding four (4) years.

This Defendant designates the following expert witnesses who are being formally retained, because of their special expertise, knowledge and training. It is anticipated that they will testify as to all matters related to this case which are within their knowledge, training, expertise and/or experience. It is further anticipated that the trial testimony they will give will pertain to the appropriate medical standards of care and any alleged breach thereof, as well as any and all issues pertaining to negligence, causation, including proximate cause, and issues related to the injuries and damages allegedly suffered by the Plaintiffs.

Further, in their testimony, they may utilize aids such as photographs, radiology/imaging studies, charts, models, computer animation, and the like, medical and/or hospital records, reports, and other evidence, as well as all appropriate medical, nursing and/or scientific books, literature and standards.

- (1) Susan C. Spencer, M.S.N., R.N.  
1018 Prince George Street  
Columbus, MS 39701

Susan C. Spencer, R.N., is a labor and delivery nurse. Nurse Spencer's practice includes the care and treatment of patients such as Leticia Garcia. For more detail of her qualifications and experience, please refer to her curriculum vitae,

which was previously produced. The subject matter of Nurse Spencer's testimony includes the standard of care for the treatment of patients such as Leticia Garcia and whether the nurses at Fort Duncan Regional Medical Center met the applicable standards of care in their care and treatment of her. Nurse Spencer will also testify as to all aspects of the care and treatment Leticia Garcia received during the time she was a patient at Fort Duncan Regional Medical Center, including care provided by other healthcare providers subsequent to and/or prior to her delivery of infant L.S.H. She may also address any and all issues expressed by the Plaintiffs' in these subject areas, and in all subject areas raised by Plaintiffs' experts, including but not limited to, liability and standards of care.

Susan C. Spencer, R.N. will testify as to the standards of care for labor and delivery nurses under the same or similar circumstances and Defendants' compliance. She will testify that the management of Leticia Garcia's labor and delivery, and shoulder dystocia management, was reasonable and appropriate, and that the hospital and its nurses were not negligent and at all times complied with the standard of care. She may also testify on liability, causation, damages and/or other related issues alleged by the Plaintiffs in this case. She may also testify regarding any opinions offered by the Plaintiffs expert witnesses' allegations of negligence in this case. For a more detailed evaluation of her impressions and opinions, please see her expert report which was previously produced. She will base her opinions on the facts acquired from her review of the documents outlined in her expert report, literature and/or her expert report, which are available to all counsel, and which are incorporated as if fully set forth herein. Her opinions will also be based on any medical literature produced in this case, as well as her knowledge, training, education and experience.

Please see Susan C. Spencer, R.N.'s compensation rate, which was previously produced.

Nurse Spencer does not have any testimonial history for the preceding four (4) years.

- (2) Charles Baldwin, M.D.  
502 Madison Oak Drive, Suite 330  
San Antonio, Texas 78258  
(210) 481-3006 Office

Charles Baldwin, M.D. is board certified in both general surgery and pediatric surgery. He is trained in pediatric surgery and is familiar with the standards of diagnosing and treating diaphragmatic plication. He is also familiar with birth injuries and the care and treatment provided to birth injuries such as those

suffered by L.S.H. Please see Dr. Baldwin's curriculum vitae, which was previously produced.

The subject matter of Dr. Baldwin's testimony includes any and all aspects regarding the care and treatment provided to L.S.H. at Fort Duncan Regional Medical Center at the time and subsequent to her birth. He may testify as to any and all issues surrounding the cause of L.S.H. claimed injuries and/or phrenic nerve injury. The subject matter of Dr. Baldwin's testimony may include the standard of care for the diagnosis and treatment of birth injuries, and whether the labor and delivery nurses and staff at Fort Duncan Regional Medical Center met the applicable standards of care, and whether the nursing care of Leticia Garcia and/or L.S.H. caused and/or contributed to L.S.H.'s claimed injuries. He will also testify as to all aspects of care and treatment Leticia Garcia and/or L.S.H. received during the time she was a patient at Fort Duncan Regional Medical Center, including care provided by the nurses at Fort Duncan Regional Medical Center. He may also address any and all care L.S.H. received by subsequent facilities and physicians after her discharge from Fort Duncan Regional Medical Center. He will testify as to all issues regarding liability, standards of care, and causation. He will also address any and all issues raised, and opinions expressed, by the Plaintiffs in these subject areas and in all subject areas raised by Plaintiffs' experts, including but not limited to standards of care, damages, causation, timing of L.S.H., and future mental and/or physical damages.

For a more detailed evaluation of his impressions and opinions, please see his expert report which was previously produced. He will base his opinions on the facts acquired from his review of the documents outlined in his expert report, literature, and/or his expert report which are available to all counsel, and which are incorporated as if fully set forth herein. His opinions will also be based on any medical literature produced in this case, as well as his knowledge, training, education and experience.

Please see Dr. Baldwin's compensation rate, which was previously produced.

Dr. Baldwin does not have any testimonial history for the preceding four (4) years.

- (4) George Mallory, M.D.  
Pulmonary Medicine Section  
Texas Children's Hospital  
6701 Fannin Street, Suite 1040  
Houston, TX 77030

George Mallory, M.D. is a board certified pediatric pulmonologist. He is trained in pediatric pulmonology and is familiar with the standards of care for the treatment, diagnosis and management, pediatric patients, including patients requiring treatment of respiratory issues. He is also familiar with birth injuries and the care and treatment provided to birth injuries such as suffered by L.S.H. For more detail of his qualifications and experience, please refer to his curriculum vitae, which was previously produced. The subject matter of his testimony may include L.S.H. medical history, conditions, alleged injuries, prognosis, progress, impairments, disabilities, present and future medical and life care needs, medical bills and issues surrounding liability, causation, and damages claimed by the Plaintiffs.

George Mallory, M.D.'s testimony may include all issues surrounding Plaintiffs' claimed damages, disabilities, future independence, and future life style, as they relate L.S.H. He may testify as to any and all issues surrounding the cause of L.S.H. claimed injuries and/or phrenic nerve injury. The subject matter of Dr. Mallory's testimony may include the standard of care for the diagnosis and treatment of birth injuries, and whether the labor and delivery nurses and staff at Fort Duncan Regional Medical Center met the applicable standards of care, and whether the nursing care of Leticia Garcia and/or L.S.H. caused and/or contributed to L.S.H.'s claimed injuries. He may also address all issues raised by the expert witnesses designated by Plaintiffs, including but not limited to, damages alleged by the Plaintiffs and the nature of the Plaintiff's injuries, standards of care for treatment of patients such as L.S.H., Defendant's compliance therewith, lack of causation for any damages alleged by the Plaintiffs, and the nature of the Plaintiffs' injuries.

For a more detailed evaluation of his impressions and opinions, please see Dr. Mallory's expert report which was previously produced. He will base his opinions on the facts acquired from his review of the documents outlined in his expert report, literature, and/or his expert report which are available to all counsel, and which are incorporated as if fully set forth herein. His opinions will also be based on any medical literature produced in this case, as well as his knowledge, training, education and experience.

Please see Dr. Mallory's compensation rate, which is \$500 per hour.

Dr. Mallory does not have any testimonial history for the preceding four (4) years.

- (5) Valerie Purcell, R.N., MBA, CLCP  
LifeCare Collaborative  
13510 Westport Lane  
Houston, Texas 77079

Valerie Purcell is a life care planner. For details regarding her qualifications, please see her curriculum vitae, which was previously produced. The subject matter of her testimony may include L.S.H.'s medical history, conditions, alleged injuries, prognosis, progress, impairments, disabilities, present and future medical and life care needs, medical bills and issues surrounding causation and damages claimed by the Plaintiffs. The subject matter of her testimony may include all issues surrounding the Plaintiffs' claimed damages, disabilities, future independence, and future life style, as they relate to L.S.H. She may also address all issues raised by the expert witnesses designated by Plaintiffs, including but not limited to, damages alleged by the Plaintiffs and the nature of the Plaintiff's injuries. She may also address the cost of reasonable future care, rehabilitation, and/or therapy, if any, for L.S.H.

The general substance of Ms. Purcell's mental impressions and opinions include an evaluation of L.S.H.'s probable life care needs associated present day costs, as well as an evaluation of the opinions expressed by the Plaintiffs' experts. For more detail of her evaluation and impressions, please see her expert report, which was previously produced. Ms. Purcell can be made available for deposition wherein either side can ascertain her mental impressions and/or opinions. Ms. Purcell's mental impressions and opinions are based on her education, training, and experience, as well as on the facts acquired from her review of the documents outlined in her report.

Please see Valerie Purcell, R.N.'s compensation rate, which was previously produced.

Please see Dr. Raine's testimonial history, which was previously produced.

- (6) Susan P. Raine, M.D., J.D.  
6651 Main Street, Suite F1096  
Houston, Texas 77030

Susan P. Raine, M.D. is board certified in obstetrics/gynecology. Dr. Raine's practice includes the diagnosis, care and treatment of patients such as Leticia Garcia. For more detail of her qualifications and experience, please refer to her curriculum vitae, which was previously produced. The subject matter of her testimony may include all issues surrounding the Plaintiffs' allegations against



this Defendant, all issues raised by the expert witnesses designated by the Plaintiffs, including but not limited to the standards of care for treatment of patients such as Leticia Garcia, Defendant's compliance therewith, lack of causation for any damages alleged by the Plaintiffs, and the nature of the Plaintiffs' injuries.

Dr. Raine may testify as to the standards of care for an Ob/Gyn physician and Labor and Delivery Nurses under the same or similar circumstances and the compliance of these Defendants. She may testify that the management of Mrs. Garcia's labor and delivery, and shoulder dystocia management, was reasonable and appropriate, and that the hospital and its nurses were not negligent. She may also testify that Leticia Garcia was contributorily negligent in failing to push effectively. She may also testify on liability, causation, damages and/or other related issues alleged by the Plaintiffs in this case. Additionally, she may testify as to L.S.H.'s physical condition, prognosis, diagnosis, etiology, as well as the care provided and the medical expenses associated therewith. Dr. Raine may also testify regarding any opinions offered by the Plaintiffs' expert witnesses' allegations of negligence in this case.

For a more detailed evaluation of her impressions and opinions, please see Dr. Raine's expert report which was previously produced. She will base her opinions on the facts acquired from her review of the documents outlined in her report, literature and/or her expert report which are available to all counsel, and which are incorporated as if fully set forth herein. Her opinions will also be based on any medical literature produced in this case, as well as her knowledge, training, education and experience.

Please see Dr. Raine's compensation rate, which was previously produced.

Please see Dr. Raine's testimonial history, which was previously produced.

- (7) Helen Reynolds, Ph.D.  
3626 North Hall Street, Suite 750  
Dallas, Texas 75219

Dr. Reynolds is an economist. For more detail of her qualifications and experience, please refer to her curriculum vitae, which was previously produced. The subject matter of her testimony may include all issues surrounding the Plaintiffs claimed damages, including but not limited to, the present value and future damages and economic analysis of Plaintiffs claimed damages. She will also discuss issues raised by Plaintiffs' expert in this subject area. The facts



known to her include her education, training, and experience as well as her review of documents outlined in her report and/or her expert report, which are available to all counsel and which are incorporated as if fully set forth herein.

Generally, her opinions and mental impressions of any future damages are subject to economic analysis which can be applied once a specific future damage allegation in dollars and cents are specified, if any. For a more detailed evaluation of her impressions and opinions, please see her expert report which was previously produced.

Please see Dr. Reynolds' compensation rate, which was previously produced.

Please see Dr. Reynolds' testimonial history which was previously produced.

- (3) Robert Gherman, M.D.  
21636 Ripplemead Drive  
Laytonsville, MD 20882

Dr. Gherman is board certified in both obstetrics and maternal fetal medicine. Dr. Gherman's practice includes the diagnosis, care and treatment of patients such as Leticia Garcia. For more detail of his qualifications and experience, please refer to his curriculum vitae, which was previously produced. The subject matter of his testimony may include all issues surrounding the Plaintiffs' allegations against this Defendant, all issues raised by the expert witnesses designated by the Plaintiffs, including but not limited to the standards of care for treatment of patients such as Leticia Garcia, Defendant's compliance therewith, lack of causation for any damages alleged by the Plaintiffs, and the nature of the Plaintiffs' injuries. Dr. Gherman will testify on all issues related to the nursing and physician standards of care and obstetrical standards of care applicable to the care and treatment of Leticia Garcia.

Dr. Gherman will testify as to the standards of care for an obstetrics physician and labor and delivery nurses under the same or similar circumstances and the compliance of these Defendants. He may testify that the management of Mrs. Garcia's labor and delivery and shoulder dystocia management was reasonable and appropriate, and that the hospital and its nurses were not negligent and at all times complied with the standard of care. Dr. Gherman will testify that Fort Duncan Regional Medical Center its nurses in no way caused or contributed to L.S.H.'s claimed injuries. He may also testify as to all aspects of care and treatment L.S.H. received during the time she was a patient at Fort Duncan Regional Medical Center, including care provided by the nurses at Fort Duncan

Regional Medical Center. He will also address any and all care L.S.H. received by subsequent facilities and physicians after her discharge from Fort Duncan Regional Medical Center. He may also testify on liability, causation, damages and/or other related issues alleged by the Plaintiffs in this case. Additionally, he may testify as to L.S.H.'s physical condition, prognosis, diagnosis, etiology, as well as the care provided and the medical expenses associated therewith. Dr. Gherman may also testify regarding any opinions offered by the Plaintiffs' expert witnesses' allegations of negligence in this case.

For a more detailed evaluation of his impressions and opinions, please see Dr. Gherman's expert report, which is attached hereto as Exhibit "V," bates labeled, "Documents 00299-00460." He will base his opinions on the facts acquired from his review of the documents outlined in his expert report, literature, and/or his expert report which are available to all counsel, and which are incorporated as if fully set forth herein. His opinions will also be based on any medical literature produced in this case, as well as his knowledge, training, education and experience.

Please see Dr. Gherman's compensation rate, which is \$400 per hour and is outlined in more detail in his report.

Please see Dr. Gherman's testimonial history, which is attached hereto as Exhibit "W," bates labeled "Documents 00461-00463."

Defendant reserves the right to call upon direct/cross and/or rebuttal examination any and all retained or designated experts identified by Co-Defendant in this cause and hereby for purposes of this designation under the Rules of Federal Procedure, incorporate by reference herein, Co-Defendant's designation of experts.

Geoffrey Schnider, M.D.  
7580 Fannin Street, Suite 310  
Houston, Texas 77054

Charlotte L. Warmington, R.N.  
2114 Radcliffe Street  
Houston, Texas 77007

Floyd Livingston, M.D.  
Nemours Children's Hospital  
Division Chief, Pediatric Pulmonary & Sleep Medicine  
Clinical Associate Professor of Pediatrics  
University of Central Florida School of Medicine  
13535 Nemours Parkway  
Orlando, Florida 32827

Terry L. Vander-Molen, Ph.D.  
P.O. Box 14273  
Austin, Texas 78761  
(512) 251-4474

Defendant also reserves the right to call for direct or cross-examination or rebuttal testimony any one or more persons named by the Plaintiffs as expert witnesses in this case. In this regard, while Defendant does not wish to be misunderstood as having designated those individuals as Defendant's experts and does not necessarily agree with the opinions of those experts, if any, Defendant reserves the right to elicit opinions and mental impressions from those witnesses and for that limited purpose list them in this designation.

Alex Willingham, M.D.  
South Texas PM&R Group  
San Antonio, Texas 78229

Dan Bagwell, BSN  
South Texas PM&R Group  
San Antonio, Texas 78229

Eric Trumble, M.D.,  
615 E. Princeton St., Suite 540  
Orlando, FL 32803

Michelle T. Wegner, R.N.C.  
3319 Book Tree Co.  
San Antonio, Texas 78261

James P. Rice, M.D.  
Multicare Women's Center  
Address unknown  
Phone unknown

James Tappan, M.D.  
20 W. Third Avenue, The Towers - Suite 602  
San Mateo, CA 94402-7115

Robert Castro, M.D.  
450 E. Romie Lane  
Salinas, CA 93901

Kenneth McCain, Ph.D.  
7670 Woodway, Suite 171  
Houston, Texas 77063

Furthermore, Defendant would cross-designate any and all experts that will be named or potentially will be named by Co-Defendant in this cause of action. Defendant reserves the right to call and/or elicit opinions and mental impressions regarding the medical condition, injuries, impairments, medical expenses, care and treatment, and all issues surrounding causation and damages claimed by the Plaintiffs. Defendant will also list them in any supplemental responses to Plaintiffs' Expert Witness Designation.

The following healthcare providers may have certain opinions regarding the medical conditions, injuries, impairments, medical expenses, and care and treatment provided by Defendant, Fort Duncan Regional Medical Center, and other medical personnel to Plaintiff Leticia Garcia and L.S.H. These individuals have not been specifically retained and/or hired as expert witnesses by Defendant. However, Defendant anticipates calling these persons to offer expert testimony as treating healthcare providers. The subject matter of the following healthcare providers may testify as to Plaintiff Leticia Garcia and L.S.H. medical history and condition, alleged injuries, prognosis, impairment, disability, if any, care and treatment, medical bills, and all issues surrounding causation and damages claimed by the Plaintiffs.

They may also address issues raised and opinions expressed by the Plaintiff in the above-listed subject areas. Furthermore, they may testify regarding the appropriate medical standards of care relating to the care and treatment of Leticia Garcia and L.S.H. They base their opinions, mental impressions, and conclusions upon their knowledge, training, education, and experience, as well as their review of the referenced materials. The names listed below have come from the medical records pertaining to Leticia Garcia and L.S.H. Their notes, opinions, findings, and reports may be contained in such records and/or in their oral/written deposition testimony. For more detail of their opinions or mental impressions, their depositions may be taken.

Leocadio Hernandez  
c/o LAW OFFICE OF RYAN KREBS, M.D., J.D.  
805 W. 10<sup>th</sup> Street, Suite 300  
Austin, Texas 78701  
and  
MALONEY LAW GROUP, PLLC  
918 South Alamo  
San Antonio, Texas 78205  
and  
RICHARD F. GUTIERREZ  
113 E. Losoya St.  
Del Rio, Texas 78840  
Father of LSH

Maria Hernandez  
c/o LAW OFFICE OF RYAN KREBS, M.D., J.D.  
805 W. 10<sup>th</sup> Street, Suite 300  
Austin, Texas 78701  
and  
MALONEY LAW GROUP, PLLC  
918 South Alamo  
San Antonio, Texas 78205  
and  
RICHARD F. GUTIERREZ  
113 E. Losoya St.  
Del Rio, Texas 78840  
Grandmother of LSH

Medical records pertaining to Leticia Dariela Garcia Aguilar:

Any and all physicians, agents, servants, representatives, nurses, and/or  
employees and the Custodian of Records of:  
Fort Duncan Regional Medical Center  
3333 North Foster Maldonado Boulevard  
Eagle Pass, Texas 78852  
(830) 773-5321  
Defendant

This list includes, but is not limited to, the following individuals:

Admission 8/29/13

Romanus O. Nwanna, M.D.  
Adriana Aranda, R.N.  
Stacy Young, R.N.  
Yolanda Stewart, R.N.  
Merlina Lazaga, R.N.  
Patti Gonzalez  
Carlos Hernandez  
Jennifer Leyva  
Tatiana Vela  
Sara Rodriguez  
Carmen Elsa Galvan  
Tri Nguyen, Pharm.  
Nnenna Nwaobia, Pharm.  
Juan Martinez, Pharm.  
Sylvia Amezcua, R.N.  
Jessica Armenta, R.N.  
Susan Martir, R.N.

Any and all physicians, agents, servants, representatives, nurses, and/or employees and the Custodian of Records of:

Romanus O. Nwanna, M.D.  
United Medical Center  
2525 Veterans Boulevard  
P.O. Box 1470  
Eagle Pass, Texas 78852  
(830) 773-5358

Any and all physicians, agents, servants, representatives, nurses, and/or employees and the Custodian of Records of:

United Medical Centers  
2525 North Veterans Boulevard  
Eagle Pass, Texas 78852  
(830) 773-5358

This list includes, but is not limited to, the following individuals:

Olga Negrete, C.O.R.  
Romanus O. Nwanna, M.D.  
George Kypuros

Juan Saucedo, D.O.  
D. Fuentes  
Iveth M. De Los Santos, C.M.A.  
Graciela Rodriguez, L.V.N.  
Linda Gonzalez  
Marina De Leon  
Brenda Franco, L.V.N.  
Anita Maldonado

Leah Saicha Hernandez

Any and all physicians, agents, servants, representatives, nurses, and/or employees and the Custodian of Records of:  
Fort Duncan Regional Medical Center  
3333 North Foster Maldonado Boulevard  
Eagle Pass, Texas 78852  
(830) 773-5321  
Defendant

This list includes, but is not limited to, the following individuals:

Admission 8/22/15

Patrick J. Schaner, F.D.R.  
Gaston I. Zylberg, M.D.  
Alberto Cavazos  
Myrna Mitchell, R.N.  
Kerry L. Locket, F.D.R.  
Veronica Diaz, R.N.  
Silvia Rodriguez

Admission 7/11/15

Patrick J. Schaner, M.D.  
Gaston I. Zylberg, M.D.  
Alberto Cavazos  
Myrna Mitchell, R.N.  
Mirtha Martinez, R.N.  
Kerry L. Locket, F.D.R.  
Jamalyn Nebreja, R.N.  
Maria E. Mallen  
Rosalinda Trevino  
Sandra Roy



Saturnino Tobias

Admission 6/24/15

Pablo Lorenzo, M.D.  
Mirtha Martinez, R.N.  
Adrian Salinas  
Rosalinda Trevino  
Alberto Cavazos  
Myrna Mitchell, R.N.

Admission 2/20/15

Gaston I. Zylberg, M.D.  
Robert C. Fountila, M.D.  
Norma Villarreal  
Nancy J. Sanchez Mammo, Tech.  
Cristina Cardona  
Saturnino Tobias  
Mirtha Martinez, R.N.  
Myrna Mitchell, R.N.

Admission 2/18/15

Curtis D. Maynard, M.D.  
Mirtha Martinez, R.N.  
Salmah Thomas, R.N.  
Myrna Mitchell, R.N.  
Gaston I. Zylberg  
Sylvia Rodriguez  
Oscar Cano, M.D.  
Ricardo Ibarra  
Chrystelle Gutierrez, M.T.  
Tatiana Vela  
Veronica Diaz, R.N.  
Ramon Rodriguez

Admission 1/12/15

Kerry L. Lockett, F.D.R.  
Gaston I. Zylberg, M.D.  
Jeffrey Pannell  
Myrna Mitchell, R.N.  
Saturnio Tobias  
Maria E. Mallen

Ramona Hurtado  
Ramon Rodriguez  
Frank W. Sabatelli, M.D.  
Proce Martinez  
Hugo Ramos, R.R.T.  
Mirtha Martinez, R.N.

Admission 11/1/14

Charles Valadez, M.D.  
Mirtha Martinez, R.N.  
Myrna Mitchell, R.N.  
Samira Jama, R.N.  
Maria G. Rodriguez  
Gaston I. Zylberg, M.D.  
Theodore B. Gupton, M.D.  
Rosalinda Trevino  
Amanda Escobedo  
Yolanda Amezcua  
Enrique Iturbe, M.T.  
Ramon Rodriguez  
Jose De J. Rodriguez  
Proce Martinez  
Mary McCloskey  
Munawar Shah  
Saturnino Tobias

Admission 9/16/14

Michael Schultz, M.D.  
Maria G. Rodriguez  
Alberto Cavazos  
Gaston I. Zylberg, M.D.  
Veronica Diaz, R.N.  
Myrna Mitchell, R.N.  
Ramona Hurtado  
Tatiana Vela  
Jose De J Rodriguez  
Jeffrey Pannell  
Mirtha Martinez, R.N.

Admission 2/25/14

Gaston I. Zylberg, M.D.  
Brenda Hnatow-Paris, M.D.  
Venorica Cruz  
Ashley Sifuentes  
Mirtha Martinez, R.N.  
Saturnino Tobias  
Pablo Lorenzo, M.D.  
Lisa Warren, R.N.  
Andrea Alvarado  
Rosario Carranco, R.N.  
Rosalinda Trevino  
Ruben Eugene Morales, R.R.T.  
Amanda Escobedo  
Alejandra Barreto  
Carmen Elsa Galvan  
Marissa Lopez, R.N.  
Noemi Sanchez  
Clarissa Hurtado  
Ramon Rodriguez  
Alberto Cavazos

Admission 12/19/13

James Gregory Vretis, D.O.  
Claudia Tompkins, R.N.  
Ely Cabais  
Rosa Daniel, R.N.  
Michelle Caston  
Maricela Ardila  
Mayra L. Cruz  
Leopoldo Cobos  
Brenda Hnatow-Paris, M.D.  
Nancy J. Sanchez, M.T.  
Alberto Cavazos  
Myrna Mitchell, R.N.  
Claudia Tompkins, R.N.

Admission 8/30/13

Gaston I. Zylberg, M.D.  
Mirtha Martinez, R.N.  
Lucy Jimenez, R.N.

A. Horerra, M.D.  
Patti Gonzalez  
Abraham Rafie, M.D.  
Jose B. Garcia  
Maria Elena Luna, L.V.N.  
Felipe Sanchez, R.R.T.  
Carmen Elsa Galvan  
Yolanda Amezcua  
Myrna Mitchell, R.N.  
Myrta Lombrana, R.N.  
Sylvia Amezcua, R.N.  
Marlina Lazaga, R.N.  
Yolanda Stewart  
Romanus O. Nwanna, M.D.

Any and all agents, servants, representatives, and/or employees and the  
Custodian of Records of:

Accion DME  
950 Dr. Ak Mittal Drive  
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(830) 758-0006

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Huge D. White

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Priscilla A. Garcia, M.A.  
Angie  
Luis Torres-Lugo, O.P.C.S.R.  
Kylie R. Litman, Dietitian  
Sharon Kluger, R.N.  
Mitzi Sandoval, M.A.  
Cristina Espinoza, R.N.  
Gaston I. Zylburg, M.D.  
Raquel A. Gonzalez, O.P.C.S.R.  
Erica L. Rodriguez, M.A.  
Celine N. Castro, R.N.  
Theresa P. Gonzalez, U.C.  
Kylie R. Litman, Dietitian  
Jeremiah Ramon, O.P.C.S.R.  
Kelley Marie Leal, R.N.  
Cynthia Flores, O.P.C.S.R.

Admission 6/18/15

Filomena R. Villa, M.D.  
Lisa J. Lunsford, M.D.  
Kathy E. Cepeda  
Lorraine Bonilla, R.N.  
Shawn K. Velez  
Kylie R. Litman, Dietitian  
Cristina Espinoza, R.N.  
Sharon Kluger, R.N.  
Mitzi Sandoval, M.A.  
Roxana Alvarez-Florencio, O.P.C.S.R.  
Angie  
Cynthia Flores, O.P.C.S.R.  
Kelley Marie Leal, R.N.  
Susan M. Gordon, R.N.  
Raquel A. Gonzalez  
Priscilla A. Garcia  
Irma J. Martinez, M.A.  
Gloria H. Ramirez, O.P.C.S.R.  
Martha Zavala, O.P.C.S.R.  
Zulma Y. Ortega, O.P.C.S.R.  
Manuel Tellez, O.P.C.S.R.  
Marison Rodriguez, P.C.P.

Laura K. Perry, S.L.P.  
Ana C. Medellin  
Marissa Perez, S.P.

Admission 4/19/15

Filomena R. Villa, M.D.  
Roxana Alvarez-Florencio, O.P.C.S.R.  
Priscilla A. Garcia, M.A.  
Kylie R. Litman, Dietitian

Admission 12/7/14

Christopher R. McNeil, M.D.  
Todd E. Stewart, M.D.  
Elizabeth Hernandez  
Maggie K. Murph, R.N.  
Carlos S. Restrepo  
Robert J. Parker, P.C.C.  
Sharon B. Kluger  
Filomena R. Villa, M.D.  
Gaston I. Zylberg, M.D.  
Mitzi Sandoval, M.A.

Admission 11/13/14

Sharon B. Kluger  
Celine Castro, R.N.  
Irma J. Martinez, M.A.  
Gloria H. Ramirez, O.P.C.S.R.  
Irma J. Martinez, M.A.  
Ana C. Medellin, O.P.C.S.R.  
Kylie R. Litman, Dietitian  
Mitzi Sandoval, M.A.  
Marissa Perez, S.P.  
Laura K. Perry, S.L.P.

Admission 10/28/14

Filomena R. Villa, M.D.  
Maria A. Diaz, O.P.C.S.R.  
Erica L. Rodriguez, M.A.  
Hector Ramos  
Elvira  
Jerome C. Evans, AuD.

Admission 9/3/14

Filomena R. Villa, M.D.  
Riley P. Scott  
Hugh D. White, M.D.  
Giri Sura  
Maria D. Diaz, O.P.C.S.R.  
Sharon B. Kluger  
Mitzi Sandoval, M.A.  
Tiffany Rodriguez, M.A.  
Kylie R. Litman, Dietitian  
Gaston I. Zylberg, M.D.  
Madalyn Rash, AuD.  
Laura K. Perry, S.L.P.  
Genevieve A. Pena, O.P.C.S.R.  
Corine Garcia  
John Aleman, O.P.C.S.R.  
Cristina Espinoza, R.N.  
Denise A. Flores, L.M.S.W.  
Angie  
Martha Zavala, O.P.C.S.R.  
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Celine N. Castro, R.N.  
Juan J. Hernandez, O.P.C.S.R.  
Delfina Ramirez, O.P.C.S.R.  
Kedar N. Chintapalli  
Andrea N. Placzek  
Raquel A. Gonzalez, O.P.C.S.R.

Admission 6/23/14

Jaime Echarte-Gonzalez, M.D.  
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Andrea N. Placzek  
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Sharon B. Kluger  
Yolanda Cantu, S.P.  
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Admission 5/7/14

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Henry Montez  
Anjali Gupta, M.D.  
Ian C. Mitchell, M.D.  
Ana C. Medellin, O.P.C.S.R.  
Erica L. Rodriguez, M.A.  
Ted W. Fehl, R.N.  
Sharon B. Kluger  
Maribel Araiza, L.V.N.  
Celine N. Castro, R.N.  
Fany Zavala, O.P.C.S.R.  
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Claribel Quinones, O.P.C.S.R.  
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Angie  
Martha Zavala, O.P.C.S.R.  
John Aleman, O.P.C.S.R.  
Tiffany Rodriguez, M.A.  
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Gaston I. Zylberg, M.D.  
Priscilla A. Garcia, M.A.

Admission 3/21/14

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William D. Moris  
Robert A. Mora, M.D.  
Kenneth T. Galfo, P.A.  
Riley P. Scott, M.D.  
Virgie E. Guardapavo, R.N.  
Danielle R. Johnson, R.N.  
Joel Hagad  
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Admission 2/9/14

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Lisa Rupp  
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Hugh D. White, M.D.  
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Admission 1/10/14

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Erica L. Rodriguez, M.A.  
Denise A. Flores, L.M.S.W.  
Holly  
Maribel Ariaza, L.V.N.  
Josefina C. Garcia, O.P.C.S.R.  
Ted W. Fehi, R.N.



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Laura A. Perez, R.N.  
Melissa L. Wilcox, M.D.  
Amy R. Quinn, M.D.  
Brooke H. Cody, P.T.  
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C. Blanco, R.N.  
M. Livingston, R.R.T.  
Alvaro G. Moreira, M.D.  
M. Guerrero, M.D.  
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Czarina N. Lagon, B.S.N., R.N.  
Courtney M. Shockley, M.D.  
R. Taylor, M.D.  
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Defendant reserves the right to supplement and/or amend this designation pursuant to the Federal Rules of Civil Procedure, Court order and/or by agreement of the parties.